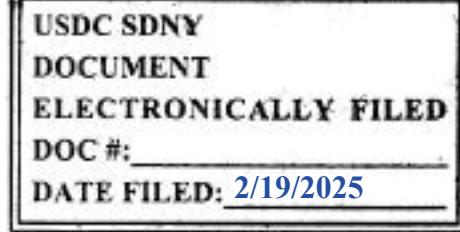


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UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

RVRG HOLDINGS LLC,

Plaintiff

v.

DUCHAT NIA, GTUIRESHANGMA,
 JINANKUNYANGCHENGDIANZHISHANGWUYOUXI
 ANGONGSI, SCHNUPFELD,
 SUININGXIANLONGRONGZHENZHIDIAN,
 XIANGYANGSHICHENLUXING,
 YUNNANMAGAOWANGLUOKEJIYOUXIANGONGS
 I, ZHENSERIND and 四川咏虹驰甜电子商务有限公司
 a/k/a SICHUAN YONGHONG CHITIAN ECOMMERCE
 CO., LTD.,

Defendants

CIVIL CASE NO.
24-cv-6052 (JHR)

[PROPOSED]
ORDER DIRECTING THE
TURNOVER OF
DEFAULTING
DEFENDANTS' ASSETS
FROM AMAZON

GLOSSARY

<u>Term</u>	<u>Definition</u>	<u>Docket Entry Number</u>
Plaintiff or RVRG Holdings	RVRG Holdings LLC	N/A
Defendants	Duchat Nia, gtuireshangma, jinankunyangchengdianzishangwuyouxiangongsi, Schnupfeld, suiningxianlongrongzhenzhidian, xiangyangshichenluxing, yunnanmagaowangluokejiyouxiangongsi, zhenserind and 四川咏虹驰甜电子商务有限公司 a/k/a Sichuan Yonghong Chitian Ecommerce Co., Ltd.	N/A
Defaulting Defendants	gtuireshangma, jinankunyangchengdianzishangwuyouxiangongsi, yunnanmagaowangluokejiyouxiangongsi, zhenserind and 四川咏虹驰甜电子商务有限公司 a/k/a Sichuan Yonghong Chitian Ecommerce Co., Ltd.	N/A
Amazon	Amazon.com, a Seattle, Washington-based, online marketplace and e-commerce platform owned by Amazon.com, Inc., a Delaware corporation, that allows manufacturers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale, sell and ship their retail products, which, upon information and belief, primarily originate from China, directly to consumers worldwide and specifically to consumers residing in the U.S., including New York	N/A
Sealing Order	Order to Seal File entered on August 8, 2024	1
Complaint	Plaintiff's Complaint filed on August 9, 2024	8
TRO Application	Plaintiff's <i>ex parte</i> Application for: 1) a temporary restraining order; 2) an order restraining Defendants' Merchant Storefronts (as defined <i>infra</i>) and Defendants' Assets (as defined <i>infra</i>) with the Financial Institutions (as defined <i>infra</i>); 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery filed on August 9, 2024	12-15
Dirocie Dec.	Declaration of Yira Dirocie in Support of Plaintiff's Application	13
Nastasi Dec.	Declaration of Gabriela N. Nastasi in Support of Plaintiff's Application	14

TRO	The Temporary Restraining Order against the Defendants, Third Party Service Providers and Financial Institutions entered by the Court on August 20, 2024	16
PI Show Cause Hearing	September 3, 2024, hearing to show cause why a preliminary injunction should not issue	N/A
PI Order	Preliminary Injunction Order entered on September 4, 2024	19
Rhude Products	Men's and women's apparel, accessories, and footwear by the globally successful ready-to-wear brand and design venture evoking streetwear and luxury fashion	N/A
Rhude Marks	U.S. Trademark Registration Nos.: 5,827,712 for "RHUDE" for a variety of goods in Class 18; 5,827,706 for "RHUDE" for goods in Class 25; and 5,385,699 for "RHUDE" for a variety of goods in Class 25	N/A
Counterfeit Products	Products bearing or used in connection with the Rhude Marks, and/or products in packaging and/or containing labels bearing the Rhude Marks, and/or bearing or used in connection with marks that are confusingly similar to the Rhude Marks and/or products that are identical or confusingly similar to the Rhude Products	N/A
Infringing Listings	Defendants' listings for Counterfeit Products	N/A
User Accounts	Any and all websites and any and all accounts with online marketplace platforms such as Amazon, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them	N/A
Merchant Storefronts	Any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in Counterfeit Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them	N/A
Defendants' Assets	Any and all money, securities or other property or assets of Defendants (whether said assets are located in the U.S. or abroad)	N/A

Defendants' Financial Accounts	Any and all financial accounts associated with or utilized by any Defendants or any Defendants' User Accounts or Merchant Storefront(s) (whether said accounts are located in the U.S. or abroad)	N/A
Financial Institutions	PayPal Inc. ("PayPal"), Payoneer Inc. ("Payoneer"), Amazon Payments, Inc. ("Amazon Pay"), PingPong Global Solutions, Inc. ("PingPong") and Airwallex (Hong Kong) Limited ("Airwallex")	N/A
Third Party Service Providers	Online marketplace platforms, including, without limitation, Amazon, as well as any and all as yet undiscovered online marketplace platforms and/or entities through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in Counterfeit Products which are hereinafter identified as a result of any order entered in this action, or otherwise	N/A
Amazon Discovery	The supplemental report identifying Defendants' Infringing Product ID, Merchant ID, Merchant Real Person Name, Email Address, Physical Address, Product Lifetime Units Sold and Product Lifetime GMV, provided by counsel for Amazon to Plaintiff's counsel pursuant to the expedited discovery ordered in both the TRO and PI Order	N/A
Plaintiff's Motion for Default Judgment	Plaintiff's Motion for Default Judgment and a Permanent Injunction Against Defaulting Defendants filed on December 10, 2024	30-33
Nastasi Aff.	Affidavit of Gabriela N. Nastasi in Support of Plaintiff's Renewed Motion for Default Judgment	31
Final DJ Order	The Final Default Judgment entered against Defaulting Defendants by the Court on February 7, 2025	40
Motion for a Turnover Order	Plaintiff's Motion for an Order Directing the Turnover of Funds from Third Party Service Provider Amazon	42
Nastasi Turnover Dec.	Declaration of Gabriela N. Nastasi in Support of Plaintiff's Motion for a Turnover Order	43

This matter comes before the Court by motion filed by Plaintiff for an Order directing the turnover of Defaulting Defendants' Assets held by Amazon, to be applied on account of the judgment in the amount of: (a) \$75,000.00 against the following five (5) Defaulting Defendants, gtuireshangma,jinankunyangchengdianzishangwuyouxiangongsi, yunnanmagaowangluokejiyouxiangongsi, zhenserind and 四川咏虹驰甜电子商务有限公司 a/k/a Sichuan Yonghong Chitian Ecommerce Co., Ltd. pursuant to Section 15 U.S.C. § 1117(c) of the Lanham Act, plus post-judgment interest. (Dkt. 40).

The Court, having considered the Memorandum of Law, Declaration of Gabriela N. Nastasi and all accompanying exhibits thereto, ~~the Court~~ hereby GRANTS the Motion for a Turnover Order.

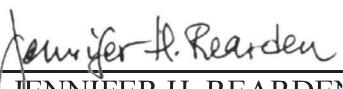
Accordingly, it is hereby ORDERED, ADJUDGED AND DECREED as follows:

- 1) The restraints on Defaulting Defendants' Financial Accounts held by Amazon are lifted for the sole purpose of effecting the transfer of all Defaulting Defendants' Assets to Plaintiff; and
- 2) Amazon shall turn over all of Defaulting Defendants' Assets held in Defaulting Defendants' User Accounts with Amazon, or so much of it as is sufficient to satisfy the judgment to Plaintiff.

SO ORDERED.

SIGNED this 19th day of February, 2025, at 8:30 a.m.

The Clerk of Court is directed to terminate ECF No. 42.


 HON. JENNIFER H. REARDEN
 UNITED STATES DISTRICT JUDGE